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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANTOINE LEVLEE LAUSHAUL,

15 Defendant,

Case No. 2:17-cr-00265-JCM-PAL

EMERGENCY UNOPPOSED MOTION TO  
MODIFY CONDITIONS OF RELEASE

17 The Defendant, Antoine Laushaul, through his attorney, Rene L. Valladares, Federal Public  
18 Defender, and Rebecca Levy, Assistant Federal Public Defender, respectfully moves this Honorable  
19 Court to modify condition of his release to allow him to travel to California on two occasions.

20 DATED this February 1, 2018

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By */s/ Rebecca Levy*  
25 REBECCA LEVY  
26 Assistant Federal Public Defender  
27 Attorney for Antoine Laushaul

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## **ARGUMENT**

On August 16, 2017, the grand jury in the District of Nevada returned a two-count indictment against Mr. Laushaul for Distribution of a Controlled Substance and Conspiracy to Distribute (the “Indictment”) Docket #1. On January 8, 2018, Mr. Laushaul was released on his personal recognizance with many conditions of release. One of those conditions is that his travel is restricted to Clark County, NV. On Friday, January 26, 2018, Mr. Laushaul’s brother passed away in California. Mr. Laushaul is seeking to go to California from February 2, 2018 until February 4, 2018 to assist in a fundraiser being put on for his brother’s funeral expenses. Mr. Laushaul is seeking to go back to California from February 9, 2018 until February 11, 2018 for his brother’s funeral. The funeral will be held at Alan Chapel in Compton, CA. While Mr. Laushaul is in California, he will stay with his mother, Stephanie Hawkins. She resides in Palmdale, CA and the address will be provided to Pre-Trial Services.

Pre-Trial Officer Emily McKillip does not oppose this request. Further, the government does not oppose this request.

## CONCLUSION

Accordingly, we are respectfully requesting this modification of the conditions of Mr. Laushaul's release to allow him to travel to California for two separate weekends after the passing of his brother.

Respectfully Submitted, this February 1, 2018

RENE L. VALLADARES  
Federal Public Defender

By /s/ Rebecca Levy  
**REBECCA LEVY**  
Assistant Federal Public Defender  
Attorney for Antoine Laushaul

## **IT IS SO ORDERED.**

Dated this 1st day of February, 2018.

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PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE